

KTF:KPO
F. #2023R00874

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

JACOB YUSUFOV,

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

RACHEL KIDD, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about June 13, 2022, within the Eastern District of New York and elsewhere, the defendant JACOB YUSUFOV did knowingly and intentionally possess one or more visual depictions using a means and facility of interstate and foreign commerce, which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(4)(B))

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT

(18 U.S.C. § 2252(a)(4)(B))

Case No. 24-MJ-131

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with HSI and have been since 2023. I have been involved in the investigation of cases involving the sexual exploitation of children. I have become familiar with cases involving production, receipt, distribution and possession of child pornography through conducting surveillance, analyzing records, executing search and arrest warrants and interviewing individuals involved with such offenses. I graduated from the HSI Special Agent Training at the Federal Law Enforcement Training Center in Glynco, Georgia in June 2023 and from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia in March 2023.

2. I have personally participated in the investigation of the offense discussed below. I am familiar with the facts and circumstances from my participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. In October 2022, Indiana State Police learned that an individual using a SnapChat account known to me ("SnapChat User-1") had received images of a 14-year-old minor female engaging in sexually explicit conduct and SnapChat User-1 was threatening to disseminate those images over the Internet. HSI subsequently identified SnapChat User-1

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

and executed a judicially authorized search warrant at their residence in Illinois. A forensic examination of the cell phone of SnapChat User-1 revealed that they had exchanged child sexual abuse material with an individual using another SnapChat account known to me (“SnapChat User-2”). A subsequent judicially authorized warrant was executed in April 2023 on the SnapChat account for SnapChat User-2. This search revealed that SnapChat User-2 had shared child sexual abuse material with a third SnapChat account known to me (“SnapChat User-3”). SnapChat User-2 and SnapChat User-3 used SnapChat to possess and engage in conversations regarding possessing and viewing child pornography.

4. On or about September 6, 2023, agents with HSI’s Child Exploitation Investigations Unit executed a judicially authorized warrant to search the account of SnapChat User-3 (the “SnapChat Warrant”). See 23-MJ-797 (VMS).

5. I reviewed the returns from the SnapChat Warrant and confirmed that the account for SnapChat User-3 contained more than 150 images and videos many of which contain child sex abuse material sent or received during the approximate timeframe of January 21, 2022 to June 13, 2022. Specifically, there were, among others, images: (1) depicting a postpubescent child female standing naked and her face, breasts and vagina are visible in the image; (2) depicting a postpubescent child female taking a naked photo with a cell phone which partially covers her face but her breasts and vagina are visible in the image; and (3) depicting two postpubescent child females wearing braces and their faces and breasts are visible in the image.

6. I have confirmed that on or about June 13, 2022, SnapChat User-2 sent Snapchat User-3 approximately four images containing child sex abuse material of a minor

victim known to me (“Victim-1”). Law enforcement agents interviewed Victim-1 who confirmed that they were 12 years old in June 2022.

7. I have confirmed that the account for SnapChat User-3 contained more than 50 images and more than 40 videos of a minor victim known to me (“Victim-2”). Victim-2 confirmed to HSI that, based on their review of some of the images, they would were 14 or 15 years old at the time of those images were taken.

8. Following the receipt of the SnapChat warrant, HSI identified that the registered user of SnapChat User-3 had an associated AOL email address (the “AOL Email”). Subpoena results from AOL for the AOL Email show a Yahoo recovery email containing a portion of the defendant JACOB YUSUFOV’s name in the handle and an associated phone number beginning in (917) (the “917 Phone Number”). Subpoena results from AT&T show that (1) the subscriber for the 917 Phone Number is an individual known to me (“Individual-1”), and (2) the user of that phone number since 2011 is YUSUFOV. In an application submitted by YUSUFOV to the Department of State for a U.S. Passport, YUSUFOV identified Individual-1 as his parent. In the same application, YUSUFOV listed his phone number as the 917 Phone Number.

9. Additionally, SnapChat account records for SnapChat User-3 show IP addresses and times associated with SnapChat User-3 logging into that account. SnapChat User-3 repeatedly accessed their account from an IP address ending in -100. This IP address is associated with a telecommunications account being serviced at an address known to me in Brooklyn, New York where the defendant JACOB YUSOF resides (the “YUSUFOV RESIDENCE”).

10. The defendant JACOB YUSUFOV currently serves as a member of the U.S. Army Reserves as a psychological operations specialist. As a member of the U.S. Army Reserves, YUSUFOV is required to keep his home address accurately updated with the U.S. Army. On February 7, 2024, a special agent with the Army Criminal Investigations Division confirmed to me that the YUSUFOV RESIDENCE is currently listed as YUSUFOV's home address.

11. Records provided by SnapChat indicate that SnapChat User-3's account was accessed from the YUSUFOV RESIDENCE as recently as December 2023.

WHEREFORE, your deponent respectfully requests that that an arrest warrant for the defendant JACOB YUSUFOV be issued so that he may be dealt with according to law. I further request that the Court order this application, including the affidavit and arrest warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation. Disclosure of this application and these orders would seriously jeopardize the ongoing investigation, as such a disclosure would give the target of the investigation an opportunity to destroy evidence, harm or threaten victims or other witnesses, change patterns of behavior, notify confederates and flee from prosecution.

/s/ Rachel Kidd
RACHEL KIDD
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

by telephone

Sworn to before me this
14 day of February, 2024

Vera M. Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK